

**IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

UNITED STATES OF AMERICA)	
)	
v.)	CR. NO. 2:06-cr-206-MHT
)	
ALETHIA ADRIANNE SCOTT)	
)	

United States's Motion for Downward Departure for Substantial Assistance

The United States moves this Court to reduce defendant Alethia Adrienne Scott's offense level by one-level based on Scott's substantial assistance in this case. As grounds for this Motion, the United States notes:

1. Scott has cooperated with the United States. During her cooperation, Scott informed the United States of additional fraud in which she and her co-defendant Kevin Brown participated. Based upon Scott's information and subsequent investigation, the United States superseded Brown's indictment. Scott also agreed to testify against Brown. While Brown has not yet pleaded guilty, the United States believes that a plea agreement with Brown is imminent and that Scott's cooperation and willingness to testify has been a factor in Brown's willingness to plead guilty.

2. The United States submits that to the best of its knowledge Scott has been truthful with federal investigators. As part of the plea agreement, Scott has waived her right to appeal and/or collaterally attack the sentence imposed in this case. Therefore, United States asks this Court to depart one-level under Guideline § 5K1.1 based upon Scott's

substantial assistance.

Respectfully submitted this the 13th day of February, 2006.

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CERTIFICATE OF SERVICE

I hereby certify that on February 13, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to Kevin Butler.

/s/ Christopher Snyder
CHRISTOPHER A. SNYDER
Assistant United States Attorney